

WESTWOOD PARK



Via Electronic Mail

November 12, 2018

Jeanie Poling
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103

Re: Written Comments of Westwood Park Association regarding Scope
of EIR for Proposed Balboa Reservoir Project
Case No: 2018-007883ENV
Meeting Date: October 30, 2018
Written Comment Deadline: November 12, 2018

Dear Ms. Poling:

The Westwood Park Association ("WPA") represents the interests of the residents of the Westwood Park Community that was developed 100 years ago in 1918 and directly adjoins the proposed Balboa Reservoir Project ("Project"). Westwood Park is a unique neighborhood that has been designated as a "Residential Character District" under Section 244 of the Planning Code in order to protect its character. Any proposed development for the Balboa Reservoir Site must take into consideration of the "special building forms and natural characteristic of the adjacent Westwood Park Residential Character District".

This letter constitutes the written comments of the WPA regarding the proposed scope of the EIR for the Project. It is WPA's understanding that the purpose of the scoping meeting is to receive public comments on the scope of the EIR for the Project.

Westwood Park Association, 236 West Portal Ave., #770, San Francisco, CA 94127
(415) 333-1125 www.westwoodparksf.org email: board@westwoodpark.com

1. Project Description

The October 10, 2017 Notice of Preparation ("Notice") states that one of the purposes of the EIR is to analyze two alternative Project options: the "Developer's Proposed Option of 1,100 housing units" and the "Additional Housing Option of 1,550 housing units". However, on page 10 of the Notice, the Project Description states that the Developer's Proposed Option will study a range of 800 to 1,300 housing units (a difference of 500 units) and the associated footnote states that the 800 unit proposal may be analyzed as a reduced density alternative. Since this is a Project EIR and not a program EIR, WPA requests that the project to be analyzed in the EIR be revised to be a Project with 1,100 units and three alternatives: a. The Reduced Density Alternative with two variants; b. The Increased Density Alternative with three variants; and, c. The mandatory No Project Alternative. A definitive Project housing unit number will provide the baseline to allow comparison of the impact of the baseline project with 1,100 housing units and the alternatives that range of from 500 to 1,950 additional housing units on our neighborhood.

2. Alternatives to be Analyzed

WPA requests that the following Alternatives, in addition to the mandatory No Project Alternative and any other alternatives being considered by the Department be analyzed in the EIR.

A. *Reduced Density Alternative:* This alternative will have two variants - a 500 unit variant and a 800 unit variant.

(1) 500 unit Variant with a maximum height of 50': ¹ This variant is consistent with the Parameters approved by the Balboa Reservoir Citizens Advisory Committee.

(2) The 800 unit Variant is one suggested in Footnote 10 in the Notice. However, the maximum height limit for the Project should be no more

¹ One of the three developers who responded to the Requests for Proposal was Related Companies that has a maximum height of 50'. In discussion with the Westwood Park Community, Related acknowledged that a 500 unit development is financially feasible.

than 65' and a 40' height maximum height limit for Blocks B, D, G and I. Additionally, Blocks TH1 and TH2 should include a landscaped open space along the west property line.

Both variants would reduce impact on traffic, be compatible with the adjoining neighborhoods and still provide needed housing to the City when compared with the higher density alternative.

B. Increased Density Alternative: This alternative will have three variants – a 1,300 unit variant which is the maximum density of the Developer's Proposed Project and a 1,550 unit variant which is referred to as the Additional Housing Option proposed by the City. WPA also suggests that a cumulative housing development that would include housing for CCSF teachers on the adjacent property owned by CCSF be added so that the EIR will analyze the cumulative impact of the maximum number of housing units being proposed between CCSF and the City. Additionally, all the variants in this Alternative should eliminate the Pedestrian Passage "Paseo" shown on Figures 6 and 7. Creation of this pedestrian passage "Paseo" to connect with San Ramon Way serves no purpose in that the residents residing to the west of the Project have multiple vehicular, pedestrian and bicycle access to Ocean Avenue. See Figure 2. of Notice. The variants that are requested to be analyzed under this Increased Density Alternative are therefore the following:

- (1) 1,300 Unit Variant: The upper limit of the study proposed by the Developer.
- (2) 1,550 Unit Variant: The City's Additional Housing Option.
- (3) The Additional Housing Option plus the 400 housing units proposed by CCSF for teachers on the eastern portion of the CCSF Campus bringing the total number housing units to 1,950 units.²

² This would include construction of housing units or other institutional use on land under the jurisdiction of CCSF that is not subject to the City Planning Code. It is important that the Project EIR include analysis of cumulative projects adjacent to the project site, such as CCSF's potential project for teacher housing, as part of its analysis of various topics, especially traffic and parking impacts.

C. The Mandatory No Project Alternative: Under the legally required No Project Alternative, the Project Site will remain unchanged. This Alternative will be based on CCSF's use of the Balboa Reservoir Site that was advocated by:

- (1) The Academic Senate of CCSF, who unanimously passed a resolution in late 2017 stating that public land should not be used for development; and
- (2) The Facilities Committee of CCSF passed a unanimous resolution on November 27, 2017, requesting the "Board of Trustees to re-examine the entire concept of the Balboa Reservoir Project because of the grave and permanent damage that would be done to CCSF and the larger community that surrounds it, especially when there are clear and demonstrable alternatives to such development."

This Alternative would retain the property owned by SFPUC for future public use. In this case, using public property by private real estate developers for profit is not appropriate when this property is adjacent to CCSF that will expand in order to meet the future needs of the City residents.

3. Transportation/Circulation

CEQA no longer requires analysis of parking, and mandate the use of vehicular miles travel ("VMT") in lieu of the use of the Level of Service ("LOS") methodology to analysis transportation impacts of a proposed project beginning in 2019. However, parking should be analyzed to provide information to the public. CCSF's students, teachers and staff use the Project Site for off-street parking. Many CCSF Students work full time and/or split shifts, attend classes during hours which they are available and must use their own car in order to get to class on time. Currently, there are 1,007 parking spaces in the Project Site. In addition, there are currently 500 parking spaces on the CCSF owned Eastern portion of the reservoir which will be lost to the Performing Arts Center and/or the proposed 400 units for teachers. Reduction of the number of parking spaces available to CCSF students, staff and teachers must be analyzed.

The Project's impact on public transportation should include its impact on MUNI lines serving CCSF and the nearby areas. We have been informed by

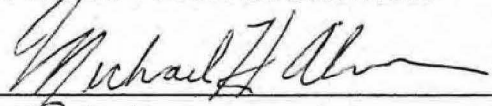
individuals familiar with current traffic problems facing Muni Lines K, 8, 9, 29, and 43, especially at the intersection of the Access Road and Frida Kahlo Way which is adjacent to Archbishop Riordan High School and the intersection of Lee and Ocean Avenues which could be exasperated by this project. (See figure 8 of Notice).

4. Conclusion

It is clear that the scope of the Project EIR is inadequate and must be amended in order to fully analyze all of the potentially adverse effects of the project and include all the alternatives and variants discussed above. Thank you for your consideration.

Very truly yours,

WESTWOOD PARK ASSOCIATION

BY 
Michael Ahrens, President

cc: Anita Theoharis, Director of WPA
Anne Chen, Director of WPA
Joe Koman, Director of WPA
Francine Lofrano, Director of WPA
Jenny Perez, Director of WPA
Ravi Krishnaswamy, Director of WPA
Norman Yee, Supervisor, District 7